

NOV 20 2019

UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

XU ZHANG

NO. 3:19-00287

  
DEPUTY CLERK

**MOTION TO SEAL INDICTMENT**

The United States of America, by and through Donald Q. Cochran, United States Attorney, and the undersigned Assistant United States Attorney, hereby moves this Court to seal the indictment in this case.

The defendant, who is charged in the indictment returned today, is charged with one count conspiracy to commit evidence tampering in violation of Title 18, United States Code, Section 1512(k) and one count of evidence tampering in violation of Title 18, United States Code, Sections 1512(c)(1) and 2.

The defendant, a Chinese national, remains under investigation for human trafficking related activities and maintains relationships with several potential subjects in an international human trafficking investigation. If the indictment is not sealed until such time as the investigation is complete, law enforcement officers responsible for investigating and arresting other targets and coconspirators will be endangered and the subjects and coconspirators may flee and/or destroy evidence.

WHEREFORE, for the above reasons, the United States respectfully requests the  
indictment be sealed as described in the attached proposed Order.

Respectfully submitted,

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Middle District of Tennessee

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